

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANA JARVIS, *et al*,

Defendants.

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§
§

Cause No. 05-CR-1849-JH

EXPEDITED RULING REQUESTED

**UNOPPOSED MOTION BY DEFENDANT GREG HILL TO BE PERMITTED
TO TRAVEL AUGUST 31 - SEPTEMBER 19, 2006**

Defendant GREG HILL, by his undersigned counsel, hereby moves this Honorable Court to permit him to travel to Frisco, North Carolina, from August 31 through September 19, 2006, in order to work as a visiting therapist at the In Touch Massage and Wellness Center, and to teach classes there. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Hill is prohibited from traveling outside the state of Indiana.
3. Mr. Hill is a licensed Reiki therapist. Mr. Hill has the opportunity to earn money by providing therapy and teaching classes at the In Touch Massage and Wellness Center. Mr. Hill has received an offer from Dhanyo Merillat-Bowers, which is attached to this motion as Exhibit A.

3. Undersigned counsel has contacted Mr. Hill's assigned Pre-trial Services Agency Officer in Indiana, Mark Cosner, and Mr. Cosner stated that he has no objection to Mr. Hill traveling out of state on the specified dates. See, Exhibit B.

4. Undersigned counsel has contacted Assistant United States Attorney James Tierney, and Mr. Tierney has stated he has no objection to Mr. Hill traveling out of state on the specified dates, given Pretrial Services' position.

Based on the foregoing, Mr. Hill requests this Honorable Court enter an Order permitting him to travel out of state to Frisco, North Carolina, from August 31 through September 19, 2006, to work at the In Touch Massage and Wellness Center.

Respectfully submitted,

electronically filed
KARI CONVERSE
2001 Carlisle Blvd. NE #E
Albuquerque, New Mexico 87110
(505) 262-8597
Fax (505) 262-1730
Counsel for Mr. Hill

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2006, I served a true and correct copy of the joinder on the following individuals at the following addresses, by fax, or by e-mail at their e-mail addresses of record:

James Braun, AUSA
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Albuquerque, NM 87106
Counsel for Dennis Wilson

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Counsel for Dakota Fitzner

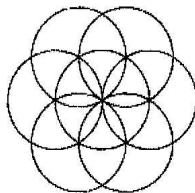
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Counsel for Melania Kirwin

Ann Steinmetz
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Albuquerque, NM 87196-4305
Counsel for Mary Cannant

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Page 1



In Touch Massage & Wellness Center
50840 Hwy. 12
Frisco, NC 27936
(252) 995-4067

Greg Hill
3900 E. Ramp Creek Rd
Bloomington IN 47401

Dear Greg,

I am looking for someone to take the place of a vacationing therapist at In Touch Massage & Wellness Center in Frisco, N.C. from September 1st- 18th and was wondering if you might be available during that time frame. It would be great to have you here and would enable us to offer our clients an opportunity to experience the possibilities that Touch for Health holds. If you would be open to teaching, I would also like to offer a couple of TTH classes while you are here, one for beginners as an intro to TTH and one to help practitioners like myself refine their skills.

I realize this is short notice but please let me know as soon as possible if you are available as I need to have some one in place by the 1st of September.

Thank You,

Dhanyo Merillat-Bowers

Dhanyo Merillat-Bowers
August 11, 2006

Exhibit A

Greg Hill

Subject: Greg Hill
From: Mark_Cosner@insd.uscourts.gov
Date: Mon, 14 Aug 2006 16:51:27 -0400
To: kariconverse@earthlink.net

Carrie,

Greg has adjusted well to pretrial supervision. He has been 100% compliant with his conditions of release and has followed all directives. He reports in a timely manner and all urine screens have been negative for drugs since his release. In consideration of these facts, I have no reservations regarding his request to travel to the east coast in order to teach for 2 weeks. He may be required to report to a local office where he is staying and it will be necessary that he provide all contact information to me while he is there.



Mark Cosner
U.S. Probation Officer
Southern District of Indiana
(812) 334-4212

1 of 1

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Exhibit B

MOTION FOR OUT OF STATE TRAVEL
UNITED STATES V. JARVIS, ET AL.

PAGE 6